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May 20, 2021

BY ECF

Honorable Analisa Torres
United States District Court Judge
United States District Court for the
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: Chalmers, et al. v. City of New York, Docket No. 20 Civ. 3389 – Request
for Extension of Time to File Pre-Summary Judgment Motion Letter

Dear Judge Torres:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, attorney for the defendant, City of New York (“defendant”), in the above-referenced action. I write to request respectfully an extension of time to file defendant’s pre-motion for summary judgment letter, until 30 days after its pending motion to dismiss is decided.

On September 21, 2020, defendant filed a motion to dismiss the Complaint in its entirety. See Dkt. No. 25. Defendant’s motion was fully submitted on November 2, 2020. See Dkt. No. 36. Consistent with the Civil Case Management Plan and Scheduling Order (Dkt. No. 32) and the Court’s subsequent Orders granting two requests for extensions of time to complete discovery (see Dkt. Nos. 39, 48), under the current schedule, defendant would be required to file its pre-motion for summary judgment letter by May 28, 2021. See Dkt. Nos. 32 and 48.

Defendant seeks the requested extension because the grounds for defendant’s motion for summary judgment will be affected by whether any (or all) claims are eliminated by resolution of defendant’s motion to dismiss. Plaintiffs’ counsel has graciously consented to this request.

Respectfully submitted,

/s/ Amanda C. Croushore

Assistant Corporation Counsel

Copy to: Plaintiffs' Counsel (by ECF)

GRANTED. Defendant shall file any pre-motion letter seeking leave to file a motion for summary judgment within **30 days** of the Court's order deciding the pending motion to dismiss.

SO ORDERED.

Dated: May 26, 2021
New York, New York



ANALISA TORRES
United States District Judge